

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
PINE BLUFF DIVISION

CARLA HARRELL

PLAINTIFF

V.

NO. 5:13-CV-00335

MAGNOLIA REGIONAL MEDICAL CENTER
and JULIE GUNNELS and JOYCELYN WATKINS
in their Individual Capacity

DEFENDANTS

RESPONSE TO NOTICE

COMES NOW the Plaintiff, by and through counsel, Sutter & Gillham, P.L.L.C., and for her response, she states:

1. Plaintiff agrees that she did not serve the defendants within 120 days. The lawsuit was held pending clarification of certain issues from the Eighth Circuit. This should be good cause to allow Plaintiff to serve this lawsuit. If not, the matter should be dismissed without prejudice.

WHEREFORE, Plaintiff prays for an order granting an extension of ninety (90) days up to and including Thursday, September 4, 2014, to perfect service up upon all defendants and including and for all other just and proper relief.

Respectfully submitted,

SUTTER & GILLHAM, P.L.L.C.
Attorneys at Law
P.O. Box 2012
Benton, AR 72018
501-315-1910 Office
501-315-1916 Facsimile
Attorney for the Plaintiff

By: /s/ Luther Oneal Sutter
Luther Oneal Sutter, AR Bar No. 95031
luthersutter.law@gmail.com